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Attorneys for Defendant Pacific University

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

FALLON HUGHES,

Plaintiff,

v.

PACIFIC UNIVERSITY,

Defendant.

Case No. 3:21-cv-00991-SI

DECLARATION OF ERIN M. BURRIS
IN SUPPORT OF DEFENDANT
PACIFIC UNIVERSITY'S REPLY IN
SUPPORT OF ITS MOTION FOR PARTIAL
SUMMARY JUDGMENT

I, Erin M. Burris, declare as follows:

1. I am counsel for defendant Pacific University (the "University") in this matter and make this declaration in support of Defendant Pacific University's Reply in Support of Its Motion for Partial Summary Judgment. In compliance with LR 7-1, on May 30, 2023, I conferred with plaintiff's counsel by telephone about this motion and the issues

described therein. I make this declaration on personal knowledge of the facts set forth herein or know of them by my review of the documents.

2. Attached as **Exhibit 1** is a true and correct copy of supplemental excerpts from the deposition transcript of Fallon Hughes dated September 14, 2022.

3. Attached as **Exhibit 2** is a true and correct copy of supplemental excerpts from the deposition transcript of Dr. Anita Jafari Cleven dated October 7, 2022.

4. Attached as **Exhibit 3** is a true and correct copy of supplemental excerpts from the deposition transcript of Dr. Reza Karimigevari dated October 24, 2022.

5. Attached as **Exhibit 4** is a true and correct copy of supplemental excerpts from the deposition transcript of Jackson Ross dated October 28, 2022.

6. Attached as **Exhibit 5** is a true and correct copy of supplemental excerpts from the deposition transcript of Melanie R. Belles dated October 7, 2022.

PURSUANT TO 28 USC § 1746, I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

DATED this 30th day of May, 2023.

s/Erin M. Burris
Erin M. Burris, OSB No. 155379

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